

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,  
STATE OF MINNESOTA,  
STATE OF CALIFORNIA,  
STATE OF NORTH CAROLINA,  
STATE OF TENNESSEE,  
STATE OF TEXAS, and  
STATE OF UTAH,

*Plaintiffs,*

v.

AGRI STATS, INC.,

*Defendant.*

No. 0:23-CV-03009-JRT-JFD

**JOINT MOTION REGARDING CONTINUED SEALING**

Documents have been filed under temporary seal in connection with the following motion:

- Non-Party Todd Fawver's Motion to Quash Deposition Subpoena, ECF No. 265

Pursuant to Local Rule 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

DKT NO.	DKT. NO. OF REDACTED DOCUMENT (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree	NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
269		Exhibit 1 to the Declaration of Davida S. McGhee Williams in Support of Non-Party Todd Fawver's Motion to Quash Deposition Subpoena (August 31, 2022, Deposition Transcript of Todd Fawver, <i>In re Turkey Antitrust Litigation</i> , Case No. 19-cv-08318 (N.D. Ill.)).	Non-party Todd Fawver takes the position that this document should remain sealed.	Cargill, Incorporated and Cargill Meat Solutions Corporation ("Cargill")	<b><u>Plaintiffs:</u></b> Plaintiffs do not oppose Todd Fawver's request that this document remain under seal.  <b><u>Todd Fawver:</u></b> The document should remain sealed because it contains discussion of competitively sensitive business information designated Highly Confidential by non-party

					Cargill pursuant to the protective order entered in the <i>Turkey</i> litigation.
288	289	Plaintiffs' Memorandum in Opposition to Hormel Foods Corporation's and Todd Fawver's Motions to Quash the United States of America's Non-Party Subpoenas.	Non-party Todd Fawver takes the position that the unredacted version of this document should remain sealed.	Cargill	<p><b><u>Plaintiffs:</u></b> Plaintiffs do not oppose Todd Fawver's request that this document remain under seal.</p> <p><b><u>Todd Fawver:</u></b> The unredacted document should sealed because it quotes from documents properly filed under seal because of their competitively sensitive business information designated Highly Confidential by non-party Cargill pursuant to protective orders entered in this litigation and the <i>Turkey</i> litigation. A redacted version of the document is publicly available.</p>
291-2		Exhibit 6:  Presentation Deck entitled: Cargill Turkey & Cooked Meats – Agri Stats Review Retail Sales Meeting dated	Non-party Todd Fawver takes the position that this document should remain sealed.	Cargill	<p><b><u>Plaintiffs:</u></b> Plaintiffs do not oppose Todd Fawver's request that this document remain under seal.</p> <p><b><u>Todd Fawver:</u></b> The document should remain sealed because</p>

		07/08/2014 bearing beginning bates number: CMS0000259589.			it contains discussion of competitively sensitive business information and has been designated Highly Confidential by non-party Cargill pursuant to the protective order entered in the <i>Turkey</i> litigation.
291-3		Exhibit 7:  Email from Jennifer Stone to Andrew Lonneman re Annual Agristats Sales Review – Recap dated 03/20/2018 bearing beginning bates number: USAAGRISTATSCMSC0000002014.	Non-party Todd Fawver takes the position that this document should remain sealed.	Cargill	<b><u>Plaintiffs:</u></b> Plaintiffs do not oppose Todd Fawver’s request that this document remain under seal.  <b><u>Todd Fawver:</u></b> The document should remain sealed because it contains discussion of competitively sensitive business information and has been designated Highly Confidential by non-party Cargill pursuant to the protective order entered in this litigation.
291-4		Exhibit 8:  Meeting Invitation from Jennifer Stone to Jennifer Stone, John Niemann,	Non-party Todd Fawver takes the position that this	Cargill	<b><u>Plaintiffs:</u></b> Plaintiffs do not oppose Todd Fawver’s request that this document remain under seal.

		Andrew Lonneman, Todd Fawver, and Timothy Maupin re AgriStats Discussion dated 03/07/2018 bearing bates number: USAAGRISTATSCMSC0000000362.	document should remain sealed.		<b><u>Todd Fawver:</u></b> The document should remain sealed because it contains discussion of competitively sensitive business information and has been designated Highly Confidential by non-party Cargill pursuant to the protective order entered in this litigation.
291-5		Exhibit 9:  Meeting Invitation from Jennifer Stone to Jennifer Stone, John Niemann, Todd Fawver, Timothy Maupin, and Andrew Lonneman re AgriStats Discussion with Stacey dated 03/08/2018 bearing bates number: USAAGRISTATSCMSC0000000363.	Non-party Todd Fawver takes the position that this document should remain sealed.	Cargill	<b><u>Plaintiffs:</u></b> Plaintiffs do not oppose Todd Fawver's request that this document remain under seal.  <b><u>Todd Fawver:</u></b> The document should remain sealed because it contains discussion of competitively sensitive business information and has been designated Highly Confidential by non-party Cargill pursuant to the protective order entered in this litigation.

Dated: April 1, 2025

Respectfully submitted,

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